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FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION  
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In the Matter of )  
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Closed Captioning and Video ) CC Docket No. 95-176  
Description of Video Programming )

COMMENTS OF DOCKET FILE COPY ORIGINAL

TELECOMMUNICATIONS FOR THE DEAF, INCORPORATED

I. Introduction

Telecommunications for the Deaf, Incorporated (TDI) hereby submits comments to the Federal Communications Commission's (Commission) Notice on Inquiry (NOI) on closed captioning and video description. Also, TDI supports the comments submitted by Consumer Action Network of, by, and for Deaf and Hard of Hearing Americans (CAN) and the National Association of the Deaf (NAD). We commend the Commission for its sincere commitment to increase the effectiveness of telecommunications for all Americans and for the opportunity to comment on this important issue.

Established in 1968, TDI is a national not-for-profit organization of deaf, hard-of-hearing, deafblind, and speech impaired consumers. Our mission is

"...to promote full visual access to information and telecommunications through consumer education and involvement, technical assistance and consulting, application of existing and emerging technologies, networking and collaboration, uniformity of standards, and national policy development and advocacy."

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TDI appreciates having the opportunity to share with the Commission our interpretations of the expectations of closed captioning and video description. To ensure equal access for everyone, TDI would like to state our support for comments submitted by the American Foundation of the Blind in favor of Commission rules to require video description of television programs.

## II. Areas that need to be explored

Issues raised in the NOI, which is well written, have been discussed and reviewed in the CAN and NAD comments. However, the following areas may need to be further explored in future notices.

### a) Definition of captioning

What is the definition of captioning? Is captioning associated only with video programming?

Even though the current NOI concentrates on video programming, we propose that the issue of accessibility to various programmings other than video programming, such as radio programming, be considered.

### b) Text

What is the definition of text? Does it include the concept of "verbatim" (see part d)? Will text be more accurate than captioning as it concentrates on printed characters regardless whether there is video? Will text broaden the accessibility not only to video programs, but also to those that are not video-related, such as radio programming?

Also, with current technology and software, text enhances accessibility to a broader population as it could easily be converted to braille for deafblind people.

### c) Definitions of voice, video, and data

The current definition of telecommunications service includes voice, video, and data. Under current technology, voice and video are

being transmitted as data. If it is necessary to maintain these three categories in the definition, even though they all are data, shouldn't text be added to all three categories to maintain consistency? Also, having text in the definition will ensure that texting receives equal recognition with or without video and minimize future reclarifications or interpretations.

d) Definition of verbatim

Is it realistic to have every spoken word texted at any speed? Independent study or research is recommended to achieve a realistic definition of "verbatim."

Is verbatim limited to words spoken? Should background noises be considered as part of the verbatim definition?

e) Edited captions or texts

What is the definition of edited captions? Is there such a thing as edited texts separate from edited captions? How much editing would be acceptable for both? Independent study or research is recommended to achieve a realistic definition of edited text.

f) Distinction between accessibility and services

There is a distinction between accessibility and educational services. This should be clarified and emphasized.

TDI considers verbatim text to be a vehicle to full accessibility while edited text is an educational service. Verbatim text is a form of actual translation from voice to text without any revisions. The edited version of text is in essence an interpretation from voice presentation to a customized printed version to meet the special needs of certain viewers with lower reading levels and/or slower reading skills.

g) Funding of captioning

TDI believes that the verbatim version or the realistic definition of verbatim captioning should be standard and follow the voice of all programmings. This can be placed in a primary captioning channel, C1, at all times. Since the producers, under

normal conditions, include voice in their production, captioning or texting in verbatim should be treated likewise.

However, should the captions be revised to meet the special needs of groups of viewers, these could be placed in another channel such as C3. Such an edited version may be viewed as special services such as, for example, the translation of languages which are usually funded by sources and not necessarily by producers themselves.

h) Responsibility of carrying captions to the public

TDI requests that the FCC be consistent in assigning and enforcing the responsibilities of ensuring the accessibility of telecommunications. In telecommunications relay services (TRS), carriers are responsible for ensuring that voice telephone and text telephone systems are interconnected. In captioning, all carriers of programmings should be given the responsibility to ensure that all programs are captioned before they are broadcasted.

With such a responsibility, all carriers and providers should include the effects of captioning in all of their current and future researches. Recently, the carriers claimed that their research on compression and decompression video programming indicated that compression and decompression works. However, they have not presented any information on effects how compression and decompression processes will impact on captioning. This could have serious consequences for accessibility.

i) Announcements of closed captioning

Frequently, program announcements in various mediums such as printed television guides or televised schedules stating programs are closed captioned turn out to be inaccurate. It is very frustrating especially when a deaf person requests a pay-view channel. A deaf person, after seeing the closed captioning symbol next to a pay-view movie either in a printed television guide or an announcement on a screen, has to go through complicated procedures such as getting a hearing person, if someone is available, to enter her/his residence to call from her/his voice telephone (meaning the need for a voice phone if the TTY is direct connected and does not require a handset)

to the cable station which uses automated billing system to connect the movie with her/his television.<sup>1</sup> If the program turns out not to be captioned, the impact of limited accessibility is compounded for the deaf viewer, who then must endeavor to get credit from the cable station, undergoing additional hassles.

### III Conclusion

TDI thanks the FCC for the opportunity to comment and share thoughts on captioning of video programming. In addition to our comments, we again strongly support the comments made by the CAN and the NAD.

We trust that such comments will receive careful consideration and eventually assist the carriers, providers, and producers of all programmings to achieve their goal of reaching out to every individual in the United States of America.

Respectfully submitted,



Alfred Sonnenstrahl, Executive Director  
Telecommunications for the Deaf, Inc.  
8719 Colesville Road, Suite 300  
Silver Spring, Maryland 20770  
301-589-3786 Voice  
301-589-3006 TTY  
301-589-3797 Fax

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<sup>1</sup> TRS do not process such calls because the cable station's touch system would not be able to locate the caller's cable box through TRS. TRS cannot facilitate the connection between the station and the caller. TRS would theoretically get billed instead of the caller.